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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

Isela HERNANDEZ-Sandoval,
Defendant.

Magistrate Case No.: '08 MJ 8353


COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

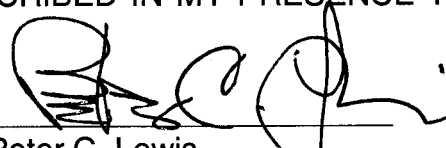
The undersigned complainant being duly sworn states:

On or about April 24, 2008, within the Southern District of California, defendant Isela HERNANDEZ-Sandoval did knowingly and intentionally import approximately 12.58 kilograms (27.68 pounds) of cocaine, a schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Chad N. Worgen
Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS 25th
DAY OF APRIL 2008.


Peter C. Lewis
U.S. Magistrate Judge

1 UNITED STATES OF AMERICA

2 v.

3 Isela HERNANDEZ-Sandoval

4 STATEMENT OF FACTS

5 This statement of facts is based on the reports, documents, and notes furnished
6 to Immigration and Customs Enforcement Special Agent Chad N. Worgen.

7 On April 24, 2008, at approximately 1116 hours, Isela HERNANDEZ-Sandoval
8 entered the United States from Mexico at the Calexico, California West Port of Entry
9 vehicle primary lane # 5. HERNANDEZ was the driver, sole occupant, and registered
10 owner of a 2003 Dodge Stratus with Mexican license plate number BEA5569.

11 Customs and Border Protection Officer (CBPO) J. Bolanos was assigned primary
12 inspection duties on lane # 5 when HERNANDEZ applied for entry. CBPO Bolanos
13 received a negative oral Customs declaration from HERNANDEZ. HERNANDEZ stated
14 to CBPO Bolanos that she was the registered owner of the vehicle, and she purchased
15 it approximately four months prior.
16

17 During questioning, CBPO Bolanos observed HERNANDEZ was nervous by her
18 upper lip shaking and her carotid artery beating rapidly. CBPO Bolanos also observed
19 HERNANDEZ' hand shaking as she presented her driver's license. During a cursory
20 inspection of the vehicle, CBPO Bolanos observed that the vehicle was extremely clean
21 and there was fresh paint on the hood of the vehicle. CBPO Bolanos referred both
22 HERNANDEZ and her vehicle to the secondary lot for an intensive inspection.
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24 CBPO R. Mendibles was assigned secondary inspection duties when he
25 observed HERNANDEZ drive the Dodge Stratus into the vehicle secondary lot for an
26 intensive inspection. CBPO Mendibles approached HERNANDEZ and received a
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1 negative oral Customs declaration. During an intensive inspection of the vehicle,
2 CBPO Mendibles observed modifications made to the interior of the dash area.

3 Canine Enforcement Officer (CEO) C. Randolph screened the vehicle with his
4 Narcotics Human Detector Dog (NHDD). CEO Randolph informed CBPO Mendibles
5 that his NHDD had alerted to the dash area of the vehicle.
6

7 Upon further inspection of the dash, CBPO Mendibles discovered a specially
8 built non-factory compartment in the dash area of the vehicle. CBPO Mendibles
9 opened the compartment and discovered numerous packages within. CBPO Mendibles
10 removed one of the packages from the compartment.
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12 CBPO Mendibles probed the package, and it produced a white powdery
13 substance that field-tested positive for cocaine. A total of 11 packages of cocaine were
14 removed from the compartment. The total weight of the packages was 12.58 kilograms
15 (27.68 pounds).
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